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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the

Federal Communications Commission

Washington, D.C. 20554

In the Matter of	)	
	)	ET Docket No. 93-40
Allocation of the	)	
219-220 MHz Band for Use by	)	RM-7747
the Amateur Radio Service	)	

COMMENTS OF THE OFFICE OF THE MANAGER OF THE NATIONAL COMMUNICATIONS SYSTEM

The Secretary of Defense, Executive Agent of the National Communications System (NCS)[1], through duly authorized counsel, pursuant to Section 201 of the Federal Property and Administrative Services Act of 1949, 40 USC Section 481, and the Memorandum of Understanding between

[1]Executive Order No. 12472, "Assignment of National Security and Emergency Preparedness Telecommunications Functions," April 3, 1984 (49 Fed. Reg. 13471, 1984), established the National Communications System (NCS), which consists of an administrative structure involving the Executive Agent, Committee of Principals, Manager, and the telecommunications assets of the Federal organizations which are represented on the Committee of Principals. Section 1(e) of Executive Order 12472 designates the Secretary of Defense as Executive Agent for the NCS. By direction of the Executive Office of the President (EOP), the NCS members organizations (which are represented on the Committee of Principals) are: Department of Agriculture, Central Intelligence Agency, Department of Commerce, Department of Defense, Department of Energy, Federal Emergency Management Agency, General Services Administration, Department of Justice, National Aeronautics and Space Administration, the Joint Staff, Department of State, Department of Transportation

the Department of Defense and the General Services Administration dated November 27, 1950, hereby files these comments on behalf of the Office of the Manager of the National Communicating System (OMNCS) in response to the Notice of Proposed Rule Making (NPRM) captioned above. In the NPRM, the Commission proposes to allocate the 219-220 MHz band to the amateur service on a secondary basis for amateur auxiliary station (point-to-point) packet backbone networks and other amateur point-to-point fixed communications. The allocation, it is believed, would alleviate frequency congestion that amateurs are experiencing in certain areas of the country in the 222-225 MHz band and would facilitate establishment of regional and nationwide backbone networks for amateur packet communications. Requirements are also proposed to ensure that secondary use of the 219-220 MHz band by amateurs does not interfere with primary and existing secondary licensees in this and adjacent bands. The proposals are in response to a petition for rulemaking filed by the American Radio Relay League (ARRL).

The OMNCS has frequently filed comments in Commission proceedings in support of the activities of amateur radio licensees, and it did so in response to the ARRL's petition for rulemaking herein. The OMNCS agrees with the Commission's statement in the NPRM (page 3) that "...the amateur service has contributed to the development of radio technology and at the same time fulfilled communications requirements during times of emergency." The OMNCS is therefore in complete accord with the Commission's proposed actions in allocating, on a secondary basis, the 219-220 MHz band to amateur operations to, among other objectives, "...encourag(e) the development and implementation of a regional and/or nationwide packet network that can be used for emergency and national

defense communications purposes." (NPRM page 4.)

The OMNCS' concern with this issue is long standing, going back to the Commission's decision to reallocate the 220-222 MHz band from the amateur service to government and non-government land mobile services,[2] a decision vigorously opposed by the OMNCS. By proposing this action, the Commission has reaffirmed its understanding of the importance of continued amateur involvement in emergency communications and has ameliorated the effects of its decision in Docket 87-14. This commendable proposal should be adopted.

CONCLUSION

The Commission's proposed action herein will enhance the ability of the amateur radio operators to continue their valuable support to national security/emergency preparedness communications and is in the public interest.

Respectfully submitted,

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[2]Report and Order, GEN Docket 87-14, 3 FCC Rcd 5287 (1988), recon. denied, 4 FCC Rcd 6407 (1989).